



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

'08 MJ 83 35

UNITED STATES OF AMERICA,

Plaintiff,

v.

Michael Douglas MOORE

Defendant.

Magistrate Case No.: ...

COMPLAINT FOR VIOLATION OF

21 U.S.C. § 952 and 960

Importation of a Controlled Substance
(Felony)

The undersigned complainant being duly sworn states:

That on or about April 18, 2008, within the Southern District of California, defendant Michael Douglas MOORE did knowingly and intentionally import approximately 51.03 kilograms (112.26 pounds) of marijuana a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.


Special Agent Lance Swanson
U.S. Immigration & Customs
Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 21st,
DAY OF APRIL 2008.


PETER C. LEWIS
UNITED STATES MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Michael Douglas MOORE

4 **PROBABLE CAUSE STATEMENT**

5 I, Special Agent Lance Swanson, declare under penalty of perjury, the following
6 is true and correct:

7 On April 18, 2008, at approximately 1500 hours, Michael Douglas MOORE
8 entered the United States at the Andrade, California, Port of Entry. MOORE was the
9 sole occupant driver of a bronze 1995 Nissan Pathfinder.

10 During the primary inspection, Customs and Border Protection Officer (CBPO) J.
11 Williams received a negative Customs Declaration from MOORE and noticed MOORE
12 was very nervous and talkative. MOORE and the vehicle were referred to secondary
13 inspection.

14 In the vehicle secondary lot, CBP officers conducted a density check on the tires
15 of the vehicle using a "Buster" Density Meter, which resulted in an unusually high
16 reading. CBP K-9 Officer M. Medley screened the vehicle with his Narcotics Detection
17 Dog (NDD). CBP K-9 Officer M. Medley received an alert from his NDD on the tires of
18 the vehicle.

19 Upon further inspection in the vehicle secondary lot, CBPO S. Jimenez
20 discovered twenty-three (23) packages in all four tires of the vehicle. One of the
21 packages was probed and a sample of a green leafy substance was obtained, which
22 field tested positive for marijuana. The 23 packages had a combined net weight of
23 approximately 51.03 kilograms (112.26 pounds).

24 MOORE was placed under arrest and advised of his Constitutional Rights, which
25 he acknowledged and waived, agreeing to answer questions. MOORE stated to Special
26 Agent Swanson he was going to be paid \$3,000.00 to smuggle marijuana into the
27 United States.

28

29

Executed on 04/19/08 @ 3:20 pm

Lance Swanson
Lance Swanson
SPECIAL AGENT

One the basis of the facts presented in the probable cause statement consisting of 2 pages, I find probable cause to believe that the defendant named in this probable cause statement committed the offense on April 18, 2008 in violation of Title 21, United States Code, Sections 952 & 960.

John M. Miller
United States Magistrate Judge

4/19/08 @ 3:31 pm
Date/Time